

.91132

\*E-FILED: January 31, 2013\*

MARK E. DAVIS—BAR NO. 79936  
DAVIS & YOUNG, APLC  
1960 The Alameda, Suite 210  
San Jose, CA 95126  
Phone: 408.244.2166  
Fax: 408.244.7815

Attorneys for Defendant  
MOUNTAIN VIEW WHISMAN SCHOOL  
DISTRICT

THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CHRISTINA MOORE,

Plaintiff,

vs.

MOUNTAIN VIEW WHISMAN  
SCHOOL DISTRICT, and DOES 1-100,  
inclusive,

Defendants.

No. CV12-02911 HRL

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING TIME FOR MEDIATION AND  
DISCOVERY (MODIFIED BY THE COURT)**

IT IS HEREBY STIPULATED, pursuant to Civil Local Rule 6-2, between Plaintiff  
CHRISTINA MOORE and defendant MOUNTAIN VIEW WHISMAN SCHOOL DISTRICT,  
that the mediation deadline and fact and expert discovery deadlines be extended 60 days.

Pursuant to the Court's Case Management Order & Order Referring The Case To  
Mediation [Document19], mediation is to be completed no later than January 30, 2013.  
Good cause exists to extend the time in which to mediate this matter and to extend the  
court appointed dates for completion for fact discovery and expert discovery for the  
following reasons:

1. Counsel for defendant Mountain View Whisman School District just

.91132

1 substituted into this matter in place and stead of Hopkins & Carley and the Court just  
2 signed the Order on January 22, 2013 [Document23].

3 2. Efforts to schedule the mediation have been hampered due to serious health  
4 issues with Court staff mediator G. Daniel Bowling. Mr. Bowling is currently consulting with  
5 his physician and setting up a treatment schedule and will be in a better position to assess  
6 when he will be available for a mediation by approximately February 11, 2013. At that time  
7 we should be able to schedule a mediation hearing date.

8 3. The parties are currently holding March 14, March 18 and March 20 as  
9 potential mediation dates.

10 The parties therefore request the court continue the deadline for completion of  
11 mediation and for completion of fact and expert discovery as follows:

12	Last day to complete mediation	April 1, 2013
13	current date 1/30/13	
14	Fact Discovery Cutoff	May 6, 2013
15	current date 3/5/13	
16	Designation of Experts with Reports	May 20, 2013
17	current date 3/19/13	
18	Designation of Rebuttal Experts with Reports	June 17, 2013
19	current date 4/16/13	
20	Expert Discovery Cutoff	July 8, 2013
21	current date 5/7/13	
22	Last Day for Hearings on Dispositive Motions	August 27, 2013
23	current date <del>6/25/13</del>	
24	Final Pretrial Conference	October 3, 2013
25	current date <del>8/1/13</del>	

26 DATED: 1/30/13

LAW OFFICES OF JOHN F. MARTIN


27   
DENISE M. CARDOSO,  
Attorneys for Plaintiff

.91132

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

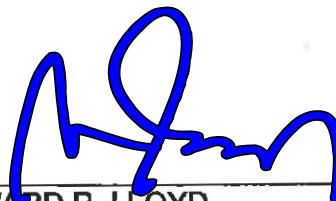
DATED: 1-30-13

DAVIS & YOUNG, APLC

By   
MARK E. DAVIS  
Attorneys for Defendant

AS MODIFIED BY THE COURT,  
PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 31, 2013

  
HOWARD R. LLOYD  
UNITED STATES DISTRICT  
MAGISTRATE JUDGE